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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMES DUFFY, a.k.a. JIM DUFFY, an individual;

Plaintiff,

vs.

JP MORGAN CHASE BANK, NATIONAL ASSOCIATION.

Defendant.

CASE No.: 2:22-cv-01988-APG-BNW

**MOTION TO EXTEND DEADLINE TO
SUBMIT PETITION FOR PERMISSION
TO PRACTICE PRO HAC VICE
PURSUANT TO LR IA 11-2(e)**

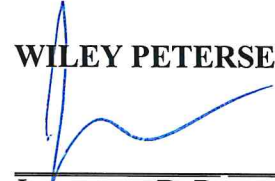
Plaintiff JAMES DUFFY, a.k.a. JIM DUFFY ("Plaintiff"), by and through his counsel of record, Jonathan D. Blum, Esq. of the law firm Wiley Petersen, and Kenneth J. Catanzarite, Esq. and Tim James O'Keefe, Esq. of the law firm Catanzarite Law Corporation, hereby submit this *Motion to Extend Deadline to Submit Petition for Permission to Practice Pro Hac Vice Pursuant to LR IA 11-2(e)* (the "Motion").

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1 This Motion is made and based upon the following memorandum of Points and Authorities, the
2 pleadings and papers on file with the Court, and any oral argument that this Court may entertain.

3 DATED this 13th day of December, 2022.

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19 *Will comply with LR IA 11-2 within 14*
20 *days*
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28 *Attorneys for Plaintiff*

POINTS AND AUTHORITIES

I. INTRODUCTION

22 Plaintiff initiated this action on November 29, 2022. The Complaint lists two California-based
23 attorneys that seek admission to represent this Plaintiff in this case pro hac vice, Kenneth Catanzarite
24 and Tim O'Keefe. Both have diligently sought certificates of good standing from each state in which
25 they are admitted to practice law. Unfortunately, not all certificates have been received, despite timely
26 request of all of them. The 14-day period to comply with LR IA 11-2 expires on December 14, 2022.
27 As such, Plaintiff seeks an additional thirty days to complete and file the verified petitions to serve as
28 counsel for Plaintiff in this case.

II. LEGAL ARGUMENT

LR IA 11-2(e) states as follows:

An attorney must comply with all provisions of this rule within 14 days of his or her first appearance. In criminal cases, the defendant(s) must execute designation(s) of retained counsel bearing the signature of both the attorney appearing pro hac vice and the associated resident attorney. The designation(s) must be filed and served within the same 14-day period.

Additionally, the form entitled, “Verified Petition For Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel” requires as follows:

3. Petitioner shall attach a certificate from the state bar or from the clerk of the supreme court or highest admitting court of each state, territory, or insular possession of the United States in which the applicant has been admitted to practice law certifying the applicant's membership therein is in good standing.

As such, all certificates of good standing are required before admission. With regard to Mr. Catanzarite, he is licensed in the following states: NY, OH, TX, KS and CA. He has received certificates of good standing from all such states, except KS and CA. With regard to Mr. O’Keefe, he is licensed in United States District Court for the Western District of Michigan and California, and is still awaiting those certificates. Due to the holidays, and the delays thus far, it is impossible to predict when the certificates will be received. Kansas and California only provide certificates via US Mail. As such, Plaintiff requests an additional 30 days to comply with the rule, which will allow sufficient time to receive the missing certificates and file the verified petition. There is good cause to extend this deadline, since the delay is not caused by Plaintiff, but organizations outside of counsel’s control. Given that Defendant has not yet filed a responsive pleading, there will be no prejudice to any party to extend the deadline as requested.

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III. CONCLUSION

Based upon the foregoing, Plaintiff's Motion should be granted, and a 30-day extension to comply with LR IA 11-2 should be entered.

DATED this 13th day of December, 2022.

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IT IS SO ORDERED:

Dated: December 14, 2022

ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE